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October 19, 2015

TRANSMITTED VIA ELECTRONIC FILING

Honorable Arlene R. Lindsay
Long Island Federal Courthouse
814 Federal Plaza
Central Islip, New York 11722-4451

Re: Rigoberto Martinez Enriquez a/k/a Hector Manuel Canales v Original
Landscaping of USA Ltd., Original Landscaping Maintenance Inc.,
and Michael Cappiello
Case No.: 2:15-cv-05245-JMA-ARL

Dear Magistrate Lindsay:

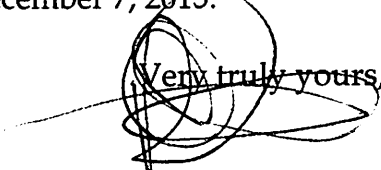
Attached hereto is the Notice of Appearance of our firm to appear in the
above captioned matter on behalf of Original Landscaping of USA Ltd., Original
Landscaping Maintenance Inc., and Michael Cappiello.

Last week we were retained to appear on behalf of the above referenced
defendants. Michael Cappiello was, according to the plaintiff's counsel, served
on October 5, 2015 and the two defendant corporations were purportedly served
via service on the Secretary of State on September 23, 2015. Each of the
defendant corporation's correct service of process address is on file with the
Secretary of State, yet neither defendant corporation has received service of
process. In light of the preceding, I have spoken to Justin M. Reilly, Esq.; he has,
on behalf of plaintiff's counsel's firm, consented to extend our clients' time to
answer or otherwise move to forty-five days beyond October 23, 2015, to wit: on
or before December 7, 2015. He and I intend to use this period of time to explore
a resolution of this matter.

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Therefore, pursuant to Your Honor's individual practice rules, I respectfully request that the defendants be granted the right to answer or otherwise move until and through December 7, 2015.


Very truly yours,

RONALD LEE GOLDSTEIN

RLG:cf
Enclosure
cc: (via electronic filing and
e-mail to:justin@nhglaw.com)
Justin M. Riley, Esq.
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So Ordered:
